

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MORDECHAI HELLMAN,

Plaintiff,

Civil Action No. 22-cv-08341 (ALC)

-against-

SHALOM JACOB, LOCKE LORD, LLP,
CORTLAND REALTY INVESTMENTS, LLC,
BARKANY ASSET RECOVERY & MANAGEMENT,
LLC, and DAVID BELSKY,

Defendants.
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NOTICE OF CROSS-MOTION


PLEASE TAKE NOTICE that, upon the annexed Declaration of Abe Grohman dated May 3, 2024, and the exhibits annexed thereto, the Declaration of Louis Loketch dated May 2, 2024, and the exhibit annexed thereto, the Declaration of Larry Twinney dated May 3, 2024, and the exhibits annexed thereto, the Declaration of Jeremy Rosenberg, Esq., dated May 6, 2024, and the exhibit annexed thereto, the accompanying Memorandum of Law, and all prior pleadings and proceedings had herein, defendants Cortland Realty Investments, LLC, and Barkany Asset Recovery and Management, LLC (collectively "Defendants"), will cross-move this Court, before the Honorable Andrew L. Carter, Jr., United States District Court Judge, at a date and time to be determined by the Court, at the Courthouse located at 40 Foley Square, New York, New York 10007, for an Order pursuant to Fed. R. Civ. P. 55(c), vacating the default entered against Defendants in this action and, upon the granting of said application, for an Order pursuant to Fed. R. Civ. P. 12(b)(6), dismissing the instant action as against Defendants.

Dated: May 6, 2024
Chestnut Ridge, New York

Respectfully submitted,

The Law Office of Jeremy Rosenberg
Attorney for Defendants

By:



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